



THE COMMONWEALTH OF MASSACHUSETTS
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November 21, 2003

Sent via e-mail, hand-delivery, and/or U.S. Mail

Mary L. Cottrell, Secretary
Massachusetts Department of Telecommunications and Energy
One South Station, 2nd Floor
Boston, MA 02110

Re: UNE Triennial Review Regarding Switching, Transport, Loops, and Batch Hot Cuts for Mass Market Customers, D.T.E.03-60

Dear Secretary Cottrell:

Enclosed for filing please find the Attorney General's First Set of Document and Information Requests to Verizon, AG-VZ-1-1 to 1-18, together with a Certificate of Service.

Sincerely,

Karlen J. Reed
Assistant Attorney General
Utilities Division
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Boston, MA 02114
(617) 727-2200 ext. 3436

KJR/kr
Enc.

cc: Paula Foley, Hearing Officer/AGC (w/enc.).
D.T.E. 03-60 Service List (w/enc.)

**THE COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY**

Proceeding by the Department of Telecommunications and Energy on its)	
own Motion to Implement the Requirements of the Federal)	
Communications Commission's Triennial Review Order Regarding)	D.T.E. 03-60
Switching for Mass Market Customers.)	
)	

**ATTORNEY GENERAL'S
FIRST SET OF DOCUMENT AND INFORMATION REQUESTS
TO VERIZON MASSACHUSETTS**

INSTRUCTIONS

1. These Document and Information Requests call for all information, including information contained in documents, which relates to the subject matter of the requests and which is known or available to Verizon New England d/b/a Verizon Massachusetts ("Verizon MA" or "Company") or to any individual or entity sponsoring testimony or retained by the Company to provide information, advice, testimony or other services in connection with this proceeding.
2. Where a Request has a number of separate subdivisions or related parts or portions, a complete response is required to each such subdivision, part, or portion. Any objection to a Request should clearly indicate the subdivision, part, or portion of the Request to which it is directed.
3. If information requested is not available in the exact form requested, provide such information or documents as are available that best respond to the Request.
4. These requests are continuing in nature and require supplemental responses when further or different information with respect to the same is obtained.
5. Each response should be furnished on a separate page headed by the individual Request being answered. Individual responses of more than one page should be stapled or bound and each page consecutively numbered.
6. Each Document and Information Request to "Please provide all documents..." or similar phrases includes a request to "identify" all such documents. "Identify" means to state the nature of the document, the date on which it was prepared, the subject matter and the titles and the names and positions of each person who participated in the preparation of

the document, the addressee and the custodian of the documents. To the extent that a document is self-identifying, it need not be separately identified.

7. For each document produced or identified in a response which is computer generated, state separately (a) what types of data, files, or tapes are included in the input and the source thereof, (b) the form of the data which constitutes machine input (e.g., punch cards, tapes), (c) a description of the recordation system employed (including descriptions, flow charts, etc.), and (d) the identity of the person who was in charge of the collection of input materials, the processing of input materials, the data bases utilized, and the programming to obtain the output.
8. If a Document and Information Request can be answered in whole or part by reference to the response to another Request served in this proceeding, it is sufficient to so indicate by specifying the other Request by participant and number, by specifying the parts of the other response which are responsive, and by specifying whether the response to the other Request is a full or partial response to the instant Request. If it constitutes a partial response, the balance of the instant Request must be answered.
9. If the Company cannot answer a Request in full, after exercising due diligence to secure the information necessary to do so, state the answer to the extent possible, state why the Company cannot answer the Request in full, and state what information or knowledge is in the Company's possession concerning the unanswered portions.
10. If, in answering any of these Document and Information requests, you feel that any Request or definition or instruction applicable thereto is ambiguous, set forth the language you feel is ambiguous and the interpretation you are using responding to the Request.
11. If a document requested is no longer in existence, identify the document, and describe in detail the reasons the document is unavailable.
12. Provide copies of all requested documents. A response which does not provide the Attorney General with the responsive documents, and requests the Attorney General to inspect documents at any location is not responsive.
13. If you refuse to respond to any Document and Information Request by reason of a claim of privilege, or for any other reason, state in writing the type of privilege claimed and the facts and circumstances you rely upon to support the claim of privilege or the reason for refusing to respond. With respect to requests for documents to which you refuse to respond, identify each such document.
14. Each request for information includes a request for all documentation which supports the response provided.

15. Provide two copies of each response to the Attorney General.
16. Unless the Request specifically provides otherwise, the term "Company" refers to Verizon MA's intrastate operations and includes all witnesses, representatives, employees, and legal counsel.
17. Please furnish each response on a separate sheet of paper, beginning with a restatement of the question.
18. Please provide all responses to requests within seven business days from receipt of these questions per the Hearing Officer's Ground Rules dated October 17, 2003.

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**ATTORNEY GENERAL'S
FIRST SET OF DOCUMENT AND INFORMATION REQUESTS
TO VERIZON MASSACHUSETTS**

Switching Triggers

- AG-VZ-1-1** Please provide a list of all Verizon-MA wire centers showing the corresponding MSA and density zone assignments that you used in your trigger analysis as described in Attachments 1, 2 and 3 to the Initial Panel Testimony of Messrs. Conroy and White filed November 14, 2003, regarding mass market switching, transport and loops ("Triggers Testimony").
- AG-VZ-1-2** Please produce the E911 study and the Line Count Study and all associated work papers, analysis and backup work referenced on page 18 of the Triggers Testimony. Please provide the Excel worksheet associated with the Line Count Study.
- AG-VZ-1-3** If the Company has done any reconciliation or reasonableness check comparing the universe of E911 lines to known line sources (cable, Verizon retail, Verizon wholesale, residence and business subtotal checks, etc.), please provide the workpapers and summaries associated with the analysis or analyses. If Verizon has not undertaken these reasonableness checks, please explain why not.
- AG-VZ-1-4** Please reconcile Verizon's statements regarding deployment by city/town of cable telephony on page 20 of the Triggers Testimony with your position on page 12 of the Triggers Testimony stating that CLECs do not enter the mass market at the wire center level.
- AG-VZ-1-5** Please provide Verizon's assumption regarding which wire center(s), MSA and density zone assignments each of the CLEC switches listed on page 16 of the

Triggers Testimony applies to.

- AG-VZ-1-6** Can UNE-Loops be used by CLECs to provide services other than voice-grade access line service? If the answer is yes, please name all of the potential services.
- AG-VZ-1-7** Please provide the number of Verizon's residential second lines on a monthly basis by wire center for the period 1/1/01 through the latest month available. Please provide any analysis (either ongoing explanations or stand-alone studies) that Verizon has undertaken to explain the reasons for monthly changes (i.e. new growth, losses to cable, losses to CLECs, losses to economy etc.). Please provide the number of total residential lines for the same period of time and at the same level of detail.
- AG-VZ-1-8** Please refer to pages 24-27 of the Triggers Testimony in which the Panel members assert that Verizon's trigger analysis undercounts the number of customers served by competitive switches. Is it Verizon's position that the number of end user customers is critical to the trigger analysis? If this is Verizon's position, please cite the relevant TRO sections.

Transport Triggers

- AG-VZ-1-9** Please provide copies of the following documents referenced in Attachment 7 of the Triggers Testimony:
- a. Target inspection list as of 6-26-03 (item 1).
 - b. All inspection worksheets as they were received from the field.
 - c. The final copies and summary copies of all inspection worksheets. Please explain any differences between the original and the final copies.
- AG-VZ-1-10** Please provide the relevant background/experience of each individual collocation inspector who participated in collecting data sought by Attachment 7.
- AG-VZ-1-11** Regarding Attachment 7, items 3.1.11 and 3.1.12, please explain the process followed when the "attempt" was unsuccessful. Please identify which attempts were successful by wire center.
- AG-VZ-1-12** Regarding Attachment 7, please explain how step 4.1.8 was carried out. What would make the equipment "appear" to be in service? What tests were done to check for power at the CLEC's equipment?
- AG-VZ-1-13** Would Column P be checked in Attachment 7, step 4.1.9, if the equipment had LED indicators on but the equipment was not connected to any circuits?
- AG-VZ-1-14**
- a. How would an inspector distinguish between Verizon and non-Verizon fiber

cable in Attachment 7, step 4.1.10?

- b. Please describe the appearance of cable terminated to equipment in the collocater's space.
- c. Did the inspector have access to the cage?
- d. If the connection was out of the line of sight of the inspector, how would they know whether it was connected or not?

AG-VZ-1-15 What training did Verizon provide to the inspectors for collecting the data for Attachment 7 beyond the written procedures supplied with the Triggers Testimony?

AG-VZ-1-16 Please provide the statistical analysis supporting the last statement on the Attachment 7, page 4, authored by J. D. Lippa. Please identify J.D. Lippa's title and work responsibilities within Verizon.

AG-VZ-1-17 Please produce copies of the New Paradigm CLEC Report pages that the Company cites in its Triggers Testimony, including references on pages 26, 44 and 45. Please indicate whether the Report pages are part of the 2003 edition or a previous edition.

AG-VZ-1-18 Referring to pages 45-46 and Attachment 8 of the Trigger Testimony, please state whether, in preparing your testimony, you have reviewed any responses from wholesale transporters, including AboveNet/MFN, NEON Communications, Inc., Qwest, and Williams Local Network, to Department-issued subpoenas in this docket as to:

- a. Whether these companies are willing to sell all specific capacities or dark fiber to other carriers on all transport routes;
- b. The identity of the transport routes that these companies have chosen not to sell all specific capacities or dark fiber to other carriers;
- c. Whether these companies are willing to sell DS1 and DS3 transport over all their fiber facilities, as well as dark fiber; and
- d. Which companies operate fiber rings in MA.

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Communications Commission’s Triennial Review Order Regarding
Switching for Mass Market Customers.

I hereby certify that I have this day served the foregoing document upon each person designated on the official service list compiled by the Secretary in this proceeding by either hand delivery, mail, and/or e-mail.

Karlen J. Reed
Assistant Attorney General
Utilities Division
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Boston, MA 02114
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